PERMIT CHECK LIST

The following people have reviewed the permit:

Reviewing Permit Writer: _____

Air Compliance Manager: _____

Date: August 20, 2012

Source Name: Canon Virginia, Inc. Registration No: 61045. Id. No.: 51-700.-00084

Source Location: 12000 Canon Blvd., Newport News, VA

Mail Address: 12000 Canon Blvd. Newport News, Va 23606-4299

Source Status: ____ Greenfield ✓ Currently operating

Source Classification: ___ Minor ✓ SynMinor ___ State Major ___ PSD Major ___ TV Major

Permit Action: updating permit due to some equipment having been shutdown and removed and addition of new toner bottle blow molding and filling lines.

✓ **Inspector Contacted Consulted**

Permit Action Program:

___ NSR ✓ SOP ___ TV ___ Maj HAP ____ General

Permit Action Type:

___ Exemption

___ New / Article 6 Modification (delete one) ✓ Significant Amendment

___ Minor Amendment/Modification ___Administrative Amendment ___ Renewal

___ State Major ___ PSD ___ Non-Attainment ___ General Permit

Y (Y/N) Permit Includes All Emission Units at Source.

Y (Y/N) Permit Allows Source to avoid Title V/MACT/etc.

After this permit, source is: ___ Major (A) ___ Minor (B) ✓ Synthetic minor (SM)

(VOC Pollutant)

Permit Application Review

✓ Permit application submitted, or ___ Letter Request

Application Received Date: 6/5/2012

Application Complete Date: 7/25/12

Permit Deadline Date: 10/23/12

✓ Document Certification Form received

n/a Confidential information with sanitized copy. If yes, which sections:

___ throughputs ___ individual pollutants ___ flow diagrams ___ calculations

___ process descriptions ___ other (describe)

If yes, has claim been accepted by DEQ? (Y/N) - Date of letter: _____

n/a Copy of letter from local official for greenfield, or major modified sources

n/a Copy of letter sent to FLM if applicable. (Comments)

n/a Notification of Affected State(s)

This permit supersedes permit(s) dated April 25, 2011.

Regulatory Review

BACT Determination (check one):

✓ dust collectors/HEPA filters @ 99 % efficiency for the control of PM meets BACT (Comments)_____, or

___ TV/SOP/BACT not applicable. (Explain)_____

Regulatory Review (cont.)

__Y__ (Y/N) NSPS/MACT/NESHAPS Applicability: If Y, Subpart(s):

__✓__ NSPS Subpart IIII

__✓__ MACT Subpart ZZZZ- area source

_____ NESHAPS

__N__ (Y/N) Existing Rules (9 VAC 5 Chapter 40) Applicability: If Y, Rule(s):

Toxic Pollutants (check one):

___ Exempt, or ___ in compliance with 9 VAC 5-60-320, or __✓__ not evaluated ***(Reminder: remember to change the regulation to 9 VAC 5-60-220 when doing a SOP for existing sources).***

[Comments: _____]

Modeling (check one):

___ Attached (including background monitors), or

___ Copy of approval letter from modeling section,

__✓__ No modeling required by agency policy (< modeling significance levels, etc.)

Site Suitability:

__✓__ Site suitable from an air pollution standpoint, inspection date __12/20/10_____,or no inspection required because _____.

__✓__ Calculation sheet(s) attached

__N__ (Y/N) NSR Netting Comments (Explain Permit History):

__N__ (Y/N) (CAM) Compliance Assurance Monitoring Applicable

Permit includes: ___ Stack Testing ___ CEM ___ VEE by source

Public Participation

__✓__ (Y/N) Public Noticed. If yes, Public Notice Date:

___(Y/N) Public Notice Comments. If yes, number and nature of comments:

___(Y/N) Public Hearing. If yes, Public Hearing Date:

EPA Review

__✓__ (Y/N) EPA Review. If yes, Date proposed permit sent to EPA_____.

____(Y/N) EPA Comments. If yes, give a brief summary_____.

Comments:

Final Recommendation: Recommend Approval.

Facility has requested an update to their permit to reflect that some equipment has been shutdown/removed and new lines are being added.

The addition of 2 new toner bottle blow molding lines is not subject to permitting as the emissions will not exhaust outside of the building. This equipment is listed under the exempt table of the equipment list.

The toner bottle filling lines will generate PM emissions to be controlled by dust collectors and HEPA filters. Calculations show that the uncontrolled PM emissions are greater than the modified source exemption rate and therefore permitting and BACT applies.

Changes to the permit are as follows:

- Moved hourly limit condition on generator to section on fuel burning equipment.
- Removal of PS-2, G-1, OPC-9, CMP, OPC-20, TC-01, RTO-1 and CA-01 and associated conditions.
- Update to facility wide emission limits (removal of equipment listed above and addition of new lines.)
- No throughput limit or emission limit for PS-3 line because emission calculations (see DEQ letter dated 4/26/12) were based on 8760 hr/yr with RTO removed.

Regulatory Review (cont.)

- Carbon adsorber existed due to the chlorinated streams from lines that were removed (OPC-9 and OPC-20). It was necessary to remove the chlorine prior to the RTO as it would cause corrosion in the RTO and produce dioxin. With the RTO shutdown and removed, the carbon adsorber is no longer needed and is allowed to be removed.
- No throughput limit for toner bottle filling lines (VY-BF1 and VY-BF2) because emissions calculations based on 8760 hr/yr.
- Added language to allow for an extension, if requested, on VEE testing due to the anticipated date of being able to reach max capacity (likely no earlier than end of March 2013). See cond. #36.

Permit Writer's Signature: _____

Air Permit Manager's Signature: _____

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
TIDEWATER REGIONAL OFFICE
5636 Southern Boulevard, Virginia Beach, Virginia 23462
(757) 518-2000 Fax (757) 518-2009
www.deq.virginia.gov

Doug Domenech
Secretary of Natural Resources

David K. Paylor
Director

Maria R. Nold
Regional Director

Date

Mr. John R. Briggs
Senior Vice President
Canon Virginia, Inc.
12000 Canon Boulevard
Newport News, Virginia 23606

Location: Newport News
Registration No.: 61045
AFS Id. No.: 51-700-00084

Dear Mr. Briggs:

Attached is a significant amendment to your state operating permit to construct and operate a manufacturing facility in accordance with the provisions of the Virginia Regulations for the Control and Abatement of Air Pollution. This permit supersedes your permit dated April 25, 2011.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

The Department of Environmental Quality (DEQ) deemed the application complete on July 25, 2012. and has determined that the application meets the requirements of 9 VAC 5-80-990 A for a significant amendment to a state operating permit. The Department solicited written public comments by placing a newspaper advertisement in the {insert name of newspaper} on {insert date of publication}. The required comment period provided by 9 VAC 5-80-1170 D expired on {insert date comment period ended}.] [A public hearing was held on {insert date of public hearing}.]

This permit approval to construct and operate shall not relieve Canon Virginia, Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. 9 VAC 5-170-200 provides that you

may request direct consideration of the decision by the Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218-1105

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

It has been determined that emergency generator EG-01 is exempt from the permitting requirements of Chapter 80, Article 6 of the Virginia Regulations for the Control and Abatement of Air Pollution as per 9 VAC 5-80-1320 B for generators of its size, fuel type, and number of hours of operation. In addition, it has been determined that the potential emissions from emergency generator EG-04 are below the emission rates in 9 VAC 5-80-1320 D. Generator EG-04 is, therefore, also exempt from permitting requirements. However, generator EG-01 is an affected facility under 40 CFR 60, New Source Performance Standards (NSPS), Subpart IIII and 40 CFR 63, Maximum Achievable Control Technology (MACT), Subpart ZZZZ. As an affected facility, the generator is subject to owner/operator requirements of the NSPS and MACT. In summary, the unit is required to comply with certain federal emission standards and operating limitations over the useful life of the engine. The Department of Environmental Quality (DEQ) advises you to review the attached NSPS and MACT to ensure compliance with applicable emission and operational limitations. As the owner/operator you are also responsible for monitoring, notification, reporting, and recordkeeping requirements of the NSPS and MACT. Generator EG-04 is also an affected facility under 40 CFR 63, Maximum Achievable Control Technology (MACT), Subpart ZZZZ. For generator EG-04, compliance with 40 CFR 63, Subpart ZZZZ may be achieved by meeting the requirements of 40 CFR 60, Subpart JJJJ. A review of Subpart JJJJ shows that there are no applicable requirements for emergency generator EG-04 under the standard because this unit is an emergency generator with a maximum engine power greater than 19 kW and was manufactured prior to the applicability date for this subpart. Therefore, compliance with 40 CFR 63, Subpart ZZZZ has been met and no further requirements of the MACT apply to your facility. However, the Department of Environmental Quality (DEQ) advises you to review the attached NSPS and MACT. As the owner/operator, you are responsible for maintaining compliance with these and all federal regulatory standards that may apply.

If you have any questions concerning this permit, please contact Kelly R. Giles by phone at (757) 518-2155 or by e-mail at kelly.giles@deq.virginia.gov.

Sincerely,

Troy D. Breathwaite
Regional Air Permits Manager

TDB/krg/61045_028_12_SOP sigamend

Attachment: Permit

Link for NSPS and MACT Regulations: NSPS, Subpart IIII
NSPS, Subpart JJJJ
MACT, Subpart ZZZZ

http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=27d0dad4dd3d4c1969aad205b798e315&c=ecfr&tpl=/ecfrbrowse/Title40/40tab_02.tpl

cc: Manager, Data Analysis (electronic file submission)
Manager/Inspector, Air Compliance
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III (electronic file submission)

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Director

Maria R. Nold
Regional Director

STATIONARY SOURCE PERMIT TO OPERATE
This permit includes designated equipment subject to New Source Performance Standards (NSPS).
This permit includes designated equipment subject to National Emission Standards for Hazardous Air Pollutants.

This permit supersedes replaces your permit dated April 25, 2011.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Canon Virginia, Inc.
12000 Canon Boulevard
Newport News, Virginia 23606-4299
Registration No.: 61045

is authorized to operate

a manufacturing facility consisting of:
Two (2) toner bottle filling lines, One (1) sleeve coating line Two (2) toner production lines, One (1) manual powder coating media line for metal parts, and One (1) automated plaforization spray washer/powder coating media process lien for metal part components.

located at

12000 Canon Boulevard
Newport News, Virginia

in accordance with the Conditions of this permit.

Approved on DRAFT - September 14, 2012.

Maria R. Nold

Permit consists of 15 pages.
Permit Conditions 1 to 45.

INTRODUCTION

1. This permit approval is based on the permit application dated July 27, 2009, and supplemental information dated August 24, 2009, August 26, 2009, August 27, 2009, and September 28, 2009; the applications for the copier-toner manufacturing plant dated July 15, 1991 and November 22, 1991, including amendment sheets dated October 18, October 24, and December 12, 1991; the permit applications for the sleeve coating line and main parts washer dated June 29, 1992 and November 20, 1992, including amendment sheets dated October 7, 8, and 15, 1992, November 24, 1992, December 7, 1992, and August 29, 2001; the permit application for the OPC coating line dated June 29, 1992, including amendment information dated September 30, 1992, October 6, 9, 15, and 21, 1992, January 8, 1993, August 29, 2001, and October 23, 2001; the two permit applications for the new sleeve coating and OPC drum coating lines dated April 19, 1994, including amendment information dated July 8, 1994, August 29, 2001, October 23 and October 26, 2001, July 10, 2003, and July 28, 2003; the application for the operation of a powder coating process dated December 20, 2001 and additional information dated January 24, 2002; the applications for the toner bottle cleaning process dated September 7, September 20, and October 1, 2004; the application for the automated plaforization and powder coating media operations dated February 1, 2007, including amendment sheets dated February 7, 2009 and March 9, 2007; the requests for permit modification dated August 17 and August 26, 2004; and the amendment information dated February 11, 2005; the permit application for the toner bottle filling lines dated June 4, 2012, including additional information dated July 25, 2012. The permit is also based on amendment information dated October 20, 2008, October 30, 2008, November 13, 2008, February 2, 2011, March 4, 2011 and March 17, 2011. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

   Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

   Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

   The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

2. **Equipment List** - Equipment at this facility consists of the following:

Equipment to be Constructed			
Reference No.	**Equipment Description**	**Control Equipment**	**Federal Requirements**
VYBF-1 VYBF-2	Two (2) Toner Bottle Filling Lines, charging stations and cleaning activities Canon, Inc.	High efficiency dust collectors with HEPA filters (TNR-DC1, TNR-DC2 and TNR-DC3) and dust collector (TNR-DC4)	N/A

Equipment permitted prior to the date of this permit			
Reference No.	**Equipment Description**	**Control Equipment**	**Original Permit Date**
PS-3	One (1) Sleeve graphite coating machine	Baghouse Dust Collector (G-2)	07-11-1994
PS-3	One (1) Sleeve graphite coating dryer	Baghouse Dust Collector (G-2)	07-11-1994
VTI-2	Toner B powder production line – open and closed transfer points	Three (3) fabric filters (#25, 93, 94) and one (1) baghouse (#7)	12-19-1991
VTI-2	Toner B powder production line – pneumatic transport separators	Seven (7) cyclones and four (4) baghouses	12-19-1991
VTI-3	Toner C powder production line – open and closed transfer points	Seven (7) fabric filters (#21(7)) and one (1) baghouse (#7)	12-19-1991
VTI-3	Toner C powder production line – pneumatic transport separators	Fifteen (15) cyclones and five (5) baghouses	12-19-1991
FM-1	One (1) Toner pre-crusher	One (1) filter fabric dust collector (#D1)	12-19-1991
ACM-30	One (1) Toner pre-crusher	Two (2) cyclones (#C1A(2)) and one (1) baghouse (#C1B)	12-19-1991
PC-01	One (1) Nordson Excel polyurethane powder coating spray booth, rated at 14.3 lbs. powder media applied to 1,000 sq. ft./hr	Powder is electrostatically applied to metal part surfaces. Unit equipped with booth dust collector using HEPA-grade filter which vents to inside environment of the facility.	3-26-2007
PW-01	One (1) Flowcoater self-contained, single-stage pretreatment unit consisting of a solvent-based chemical spray-washer, excess solution drain-off area, and blow-off compartment housed within the unit, rated at 1,000 sq. ft. of material surface treated./hr	Three (3) sets of horizontal flex vapor curtains. Adjustable dampeners at sides of entrance & exit vestibules supply air intake to 1.5 hp exhaust fan unit located on top of Flowcoater to vent vapors to exhaust stack through roof. Holding tank (522 gal. capacity) for the plaforization chemical equipped with removable vapor barrier shield over tank top to reduce potential evaporation.	3-26-2007
N/A	Overhead conveyor system for the transporting of metal parts, rated at 1,000 sq. ft./hr	N/A	3-26-2007

Equipment Exempt from Permitting					
Reference No.	**Equipment Description**	**Rated Capacity**	**Exemption Citation**	**Exemption Date**	**Federal Requirements**
VYBM-1 VYBM-2	Two (2) Toner Bottle Blow Mold Lines, Nissei ASB	127 lbs/hr	9 VAC 5-80-1320 D.1	**DATE of this permit**	N/A
DO-01 CO-01	One (1) natural gas-fired combination dry-off & powder coating curing oven.	2.50 MMBtu/hr (each): 5.00 MMBtu/hr total	9 VAC 5-80-1320.B.1.d	03-26-2007	N/A
B-01	One (1) natural gas-fired Cleaver Brooks steam boiler, Model CB-700-70	2.93 MMBtu/hr	9 VAC 5-80-1320.B.1.d	08-16-1989	N/A
B-02 B-03 B-05	Three (3) natural gas-fired Cleaver Brooks hot water boilers, Model CB-700-200	8.37 MMBtu/hr (each)	9 VAC 5-80-1320.B.1.d	08-16-1989	N/A
B-04	One (1) natural gas-fired, Cleaver Brooks steam boiler, Model CB-700-70	2.93 MMBtu/hr	9 VAC 5-80-1320.B.1.d	N/A	N/A
B-07	One (1) natural gas-fired Cleaver Brooks steam boiler, Model CB-700-50	2.07 MMBtu/hr	9 VAC 5-80-1320.B.1.d	N/A	N/A
TB-01	One (1) natural gas-fired Cleaver Brooks boiler, Model CB-700-60 (Toner Plant boiler)	2.52 MMBtu/hr	9 VAC 5-80-1320.B.1.d	08-16-1989	N/A
MC-01	One (1) spray booth for manual powder coating applications	1 lb/minute maximum of powder sprayed	9 VAC 5-80-1320.D.1	01-25-2002	N/A
CO-02	One (1) natural gas-fired batch powder curing oven for the manual powder coating applications	0.70 MMBtu/hr	9 VAC 5-80-1320.B.1.d	01-25-2002	N/A
C228-1 C228-2	Two (2) toner cartridge filling lines	500 cartridges filled/hr (each)	9 VAC 5-80-1320 D	11-6-2007	N/A
BO-01	One (1) natural gas-fired burn-off oven for the automated powder coating applications	0.460 mmBtu/hr	9 VAC 5-80-1320 B.1.d	02-10-2009	N/A
EG-01	One (1) diesel emergency generator (Installed 1/09)	50 kW	9 VAC 5-80-1320 B.2.b	N/A	40 CFR 60, Subpart IIII (NSPS) 40 CFR 63, Subpart ZZZZ (MACT)
EG-02	One (1) natural gas emergency generator (Installed 2/96)	70 kW	9 VAC 5-80-1320 D.1	N/A	N/A
EG-03	One (1) natural gas emergency generator (Installed 7/99)	100 kW	9 VAC 5-80-1320 D.1	N/A	N/A
EG-04	One (1) natural gas emergency generator (Installed 9/06)	125 kW	9 VAC 5-80-1320 D.1	N/A	40 CFR 63, Subpart ZZZZ (MACT)
SLS-1	One (1) diesel emergency generator (Installed 1/87)	12 kW	9 VAC 5-80-1320 B.2.b	N/A	N/A
SLS-2	One (1) diesel emergency generator (Installed 1/88)	12 kW	9 VAC 5-80-1320 B.2.b	N/A	N/A
SB-01	One (1) Sleeve sandblasting unit	500 Sleeves/hr	9 VAC 5-80-1320 D.1	N/A	N/A

Equipment to be Removed by this Permit				
Reference No.	**Equipment Description**	**Control Equipment**	**Federal Requirements**	**Original Permit Date**
PS-2	One (1) Sleeve graphite coating machine	Baghouse Dust Collector (G-1) and regenerative thermal oxidizer (RTO-1)	N/A	12-23-1992
PS-2	One (1) Sleeve graphite coating dryer	Baghouse Dust Collector (G-1) and regenerative thermal oxidizer (RTO-1)	N/A	12-23-1992
N/A	Chlorinated waste streams from coating and peeling operations	Carbon Adsorber unit (CA-1)	N/A	12-23-1992
OPC-9-CP	Eight (8) drum coating machines and six (6) peeling machines	Regenerative thermal oxidizer (RTO-1)	N/A	07-13-1989
OPC-9-D1, 2, 3, & 4	Four (4) drum dryers	Regenerative thermal oxidizer (RTO-1)	N/A	07-13-1989
OPC-20-CP	Eight (8) drum coating machines and eight (8) peeling machines	Regenerative thermal oxidizer (RTO-1)	N/A	07-11-1994
OPC-20-D1, 2, 3, & 4	Four (4) drum dryers	Regenerative thermal oxidizer (RTO-1)	N/A	07-11-1994
CMP	One (1) compound mixing room	Three (3) exhaust vents	N/A	10-09-1990
TC-01	One (1) Toner bottle cleaning process	One (1) Torrit dust collector and Vac-U-Max Model 3300 System (HEPA filter)	N/A	03-15-2005

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.
(9 VAC 5-80-850)

FUEL BURNING EQUIPMENT OPERATIONS

3. **Emission Controls** - Emissions from the fuel burning equipment shall be controlled by good combustion practices and by proper operation and maintenance of the equipment. The boilers and ovens shall be provided with adequate access for inspection.
(9 VAC 5-80-850)

4. **Fuel** - The approved fuels are listed in the table below.

Equipment Reference No.		Approved Fuel Type
Boilers	B-01	Natural Gas
	B-02	Natural Gas
	B-03	Natural Gas
	B-04	Natural Gas
	B-05	Natural Gas
	B-07	Natural Gas
	TB-01	Natural Gas

Equipment Reference No.		Approved Fuel Type
Emergency Generators	EG-01	Distillate/Diesel Oil
	EG-02	Natural Gas
	EG-03	Natural Gas
	EG-04	Natural Gas
	SLS-1	Distillate/Diesel Oil
	SLS-2	Distillate/Diesel Oil
Dry-Off/Curing Oven	DO-01 CO-01	Natural Gas
Curing Oven	CO-02	Natural Gas
Burn-Off Oven	BO-01	Natural Gas

A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-850 and 9 VAC 5-80-1180)

5. **Fuel** - The distillate oil received for the NSPS Subpart IIII applicable emergency generator (EG-01) shall meet the specifications below:

   DISTILLATE OIL which meets the ASTM D396 specification for numbers 1 or 2 fuel oil:

   Maximum sulfur content per shipment: 0.0015 %
   (9 VAC 5-80-850)

6. **Fuel** - The distillate oil received for the non-NSPS Subpart IIII applicable emergency generators (SLS-1 and SLS-2) shall meet the specifications below:

   DISTILLATE OIL which meets the ASTM D396 specification for numbers 1 or 2 fuel oil:

   Maximum sulfur content per shipment: 0.5 %
   (9 VAC 5-80-850)

7. **Fuel Certification** - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil for the emergency generators (EG-01, SLS-1, and SLS-2). Each fuel supplier certification shall include the following:

   a. The name of the fuel supplier;

   b. The date on which the distillate oil was received;

   c. The quantity of distillate oil delivered in the shipment;

   d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications (ASTM D396) for numbers 1 or 2 fuel oil; and

e. In addition, for the NSPS Subpart IIII applicable emergency generator (EG-01) only: The sulfur content of the distillate oil.

Fuel sampling and analysis, independent of that used for certification, as may be periodically required or conducted by DEQ may be used to determine compliance with the fuel specifications stipulated in Condition numbers 5 and 6. Exceedance of these specifications may be considered credible evidence of the exceedance of emission limits.
(9 VAC 5-80-850)

8. **Operating Hours** - The operation of each emergency generator (EG-01, EG-02, EG-03, EG-04, SLS-1, and SLS-2) shall not exceed 500 hours per year, including periodic equipment maintenance checks and operational training; calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

TONER BOTTLE FILLING OPERATIONS

9. **Emission Controls** - Particulate emissions from the toner bottle filling lines (VYBF-1 and VYBF-2) shall be controlled by high efficiency dust collectors with HEPA filters (TNR-DC1, TNR-DC2 and TNR-DC3) and dust collector (TNR-DC4). The dust collectors shall be provided with adequate access for inspection.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

10. **Process Emission Limits** - Emissions from the operation of the toner bottle filling lines (VYBF-1 and VYBF-2) shall not exceed the limits specified below:

Pollutant	Lbs/hr	Tons/yr
PM	0.2	0.9

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 9, 11 and 36.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

11. **Visible Emission Limit** - Visible emissions from any of the high efficiency dust collectors with HEPA filters (TNR-DC1, TNR-DC2 and TNR-DC3) and dust collector (TNR-DC4) shall not exceed five percent (5%) opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

SLEEVE COATING OPERATIONS

12. **Emission Controls** - Particulate emissions from the sleeve coating line (PS-3) shall be controlled by fabric filters. The fabric filters shall be provided with adequate access for inspection.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

13. **Visible Emission Limit** - Visible emissions from the fabric filters (G-2) shall not exceed five percent (5%) opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850)

14. **VOC Work Practice Standards** - At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9 VAC 5-50-20 F and 9 VAC 5-80-850)

TONER MANUFACTURING OPERATIONS

15. **Transfer Points** - "Open transfer points" shall be defined as points where material is loaded into equipment. "Closed transfer points" shall be defined as points where material is unloaded from equipment.
(9 VAC 5-80-850 and 9 VAC 5-80-1180)

16. **Emission Controls** - Particulate emissions from the open and closed transfer points of the Toner B production line (VTI-2) shall be controlled by three (3) fabric filters (#25, 93 and 94) and one (1) baghouse (#7). All control equipment shall be provided with adequate access for required inspection by the DEQ.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)
17. **Emission Controls** - Particulate emissions from the pneumatic transport separators of the Toner B production line (VTI-2) shall be controlled by seven (7) cyclones and four (4) baghouses. All control and transporting equipment shall be provided with adequate access for required inspection by the DEQ.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)
18. **Emission Controls** - Particulate emissions from the open and closed transfer points of the Toner C production line (VTI-3) shall be controlled by seven (7) fabric filters (#21(7)) and one (1) baghouse (#7). All control equipment shall be provided with adequate access for required inspection by the DEQ.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

19. **Emission Controls** - Particulate emissions from the pneumatic transport separators of the Toner C production line (VTI-3) shall be controlled by fifteen (15) cyclones and five (5) baghouses. All control and transporting equipment shall be provided with adequate access for required inspection by the DEQ.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

20. **Emission Controls** - Particulate emissions from pre-crusher (#FM-1) shall be controlled by one (1) fabric filter (#D1). The fabric filter shall be provided with adequate access for inspection by the DEQ.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

21. **Emission Controls** - Particulate emissions from pre-crusher (#ACM-30) shall be controlled by two (2) cyclones (#C1A (2)) and one (1) baghouse (#C1B). The cyclones and baghouse shall be provided with adequate access for inspection by the DEQ.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

22. **Emission Controls** - Fugitive particulate emissions from the baghouse waste discharge ducts of the Toner B (VTI-2) and Toner C (VTI-3) manufacturing lines and the two pre-crushing stations shall be controlled by rotary valves, double dampers, and inflation cuffs.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

23. **Emission Controls** - Particulate emissions from the toner bottle cleaning process (TC-01) shall be controlled by a Torrit dust collector, and a HEPA filter following the Vac-U-Max system.
(9 VAC 5-80-850 and 9 VAC 5-80-1180)

24. **Visible Emission Limit** - Visible emissions from any of the fifteen (15) baghouse vents, the pre-crusher exhaust, the Torrit dust collector, or the Vac-U-Max/HEPA filter system shall not exceed five percent (5%) opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

25. **Testing/Monitoring Ports** - The permitted toner manufacturing facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. This includes constructing the facility such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and providing stacks or ducts that are free from cyclonic flow. Test ports shall be provided when requested at the baghouse exhaust stacks.
(9 VAC 5-80-850, 9 VAC 5-50-30 F, and 9 VAC 5-80-1180)

26. **Production** - The annual production of Toner B (VTI-2) and Toner C (VTI-3) shall not exceed 1,527 tons (1,388 metric tons) and 1,775 tons (1,614 metric tons), respectively, and be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

AUTOMATED PLAFORIZATION AND POWDER COATING MEDIA OPERATIONS

27. **Throughput** - The throughput of polyurethane powder coating media to the powder coating media spray booth (PC-01) shall not exceed 71,400 pounds per year and have a VOC content not to exceed 0.0036 pounds per pound of powder coating media (0.36% VOC). The throughput of powder coating media shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

28. **Throughput** - The throughput consumption of the chemical used in the plaforization process (PW-01) shall not exceed 3,570 gallons per year; calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

29. **Process Emission Limits** - Emissions from the operation of the automated plaforization and powder coating media process (PC-01 and PW-01) shall not exceed the limits specified below:

Pollutant	Lbs/hr	Tons/yr
VOC	3.4	8.3

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 32 and 33. (9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

30. **Testing/Monitoring Ports** - The automated plaforization and powder coating media process line shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided.
(9 VAC 5-80-850, 9 VAC 5-50-30 F, and 9 VAC 5-80-1180)

MANUAL BATCH POWDER COATING MEDIA OPERATIONS

31. **Emission Controls** - Particulate emissions from the manual batch powder coating media applications in the manual powder spray coating booth (MC-01) shall be controlled by a cartridge filter located inside the booth. Powder overspray deposited on the cartridge filter shall be automatically dislodged by using reverse-pulse compressed air, causing the powder to fall into a bin-hopper for manual "closed-loop" recycling. The cartridge filter shall be provided with adequate access for inspection.
(9 VAC 5-80-850)

32. **Process Emission Limits** - Emissions from the operation of the manual batch powder coating media process (MC-01) shall not exceed the limits specified below:

Pollutant	Lbs/hr	Tons/yr
PM	6.0	1.5

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits.
(9 VAC 5-80-850)

EMISSION LIMITS

33. **Facility-wide Emission Limits** - Total emissions from the manufacturing facility shall not exceed the limits specified below:

Pollutant	Tons/yr

PM	10.5
Nitrogen Oxides (as NO_2)	20.7
Carbon Monoxide	14.4
VOC	10.8

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 3 through 32 and 34.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-260)

RECORDS

34. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

a. Annual production of toner (in tons) from the toner processing lines B and C, calculated monthly as the sum of each consecutive 12-month period;

b. Monthly and annual throughputs (in pounds) of powder coating media used in the spray coating of the metal component parts for the automated and manual batch operations. Annual throughput of media for each process shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;

c. Monthly and annual throughputs (in gallons) of chemical solvent used in the plaforization of the metal component parts. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;

d. Annual hours of operation for each emergency generator, calculated monthly as the sum of each consecutive 12-month period;

e. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), and other vendor information as approved by DEQ showing applicable VOC content, toxic compound content, HAP content, and solids content for coating solutions, powder coating media, cleaning solutions, thinners, and plaforization solution used in the various manufacturing processes; and

f. Results of all visible emissions evaluations.

These records shall be available for inspection and shall be current for the most recent five (5) years.
(9 VAC 5-80-850, 9 VAC 5-80-1180, and 9 VAC 5-50-50)

NOTIFICATIONS

35. **Initial Notifications** - The permittee shall furnish written notification to the Tidewater Regional Office of:

a. The actual date on which construction of the Toner Bottle Filling Lines (VYBF-1 and VYBF-2) commenced within 30 days after such date.

b. The actual start-up date of the Toner Bottle Filling Lines (VYBF-1 and VYBF-2) within 15 days after such date.

(9 VAC 5-50-50 and 9 VAC 5-80-1180)

INITIAL COMPLIANCE DETERMINATION

36. **Visible Emissions Evaluation -** Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be conducted on the following equipment: TNR-DC1, TNR-DC-2, TNR-DC-3 and TNR-DC4. Each test shall consist of 30 sets of 24 consecutive observations (at 15 second intervals) to yield a six minute average. The details of the tests are to be arranged with the Tidewater Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. The evaluation shall be performed and demonstrate compliance within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after start-up of the permitted facility, unless an extension is approved in writing by DEQ in advance. One copy of the test result shall be submitted to the Tidewater Regional Office within 45 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-50-30, 9 VAC 5-80-1200)

GENERAL CONDITIONS

37. **Permit Invalidation** – The portions of this permit to construct the Toner Bottle Filling Lines (VYBF-1 and VYBF-2) shall become invalid, unless an extension is granted by the DEQ, if:

    a. A program of continuous construction, reconstruction, or modification is not commenced within the latest of the following:

        i. 18 months from the date of this permit;

        ii. Nine months from the date that the last permit or other authorization was issued from any other governmental entity;

        iii. Nine months from the date of the last resolution of any litigation concerning any such permits or authorization; or

    b. A program of construction, reconstruction, or modification is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

    (9 VAC 5-80-1210)

38. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

    a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-850)

39. **Record of Malfunctions** – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.
(9 VAC 5-20-180 J and 9 VAC 5-80-850)

40. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Tidewater Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Tidewater Regional Office in writing.
(9 VAC 5-20-180 C and 9 VAC 5-80-850)

41. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-850)

42. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.
(9 VAC 5-50-20 E and 9 VAC 5-80-850)

43. **Permit Suspension/Revocation** - This permit may be revoked if the permittee:

a. Knowingly makes material misstatements in the permit application or any amendments to it;

b. Fails to comply with the terms or conditions of this permit;

c. Fails to comply with any emission standards applicable to a permitted emissions unit;

d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;

e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time that an application for this permit is submitted;

f. Fails to comply with the applicable provisions of Articles 6, 8 and 9 of 9 VAC 5 Chapter 80.

(9 VAC 5-80-1010)

44. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Tidewater Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-940)

45. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-860 D)

DRAFT PERMIT APPROVAL FORM

Department of Environmental Quality
Tidewater Regional Office
5636 Southern Blvd.
Virginia Beach, Virginia 23462

Instructions:

The "Draft Permit Approval Form" provides the owner or certified company official an opportunity to accept or suggest appropriate changes to a draft permit. If a signed form is not received within one (1) week of the date of receipt of the draft permit, DEQ will assume that the draft permit is considered acceptable and will proceed with processing the permit.

Please check the applicable statement(s) below after thoroughly reviewing the draft permit. Scanned forms (with signatures) may be returned to "permit writer"@deq.virginia.gov or troy.breathwaite@deq.virginia.gov.

If scanning is not available, please fax to 757-518-2009, Attention: "permit writer" or Mr. Troy D. Breathwaite.

____ The owner or certified company official agrees with the conditions of the draft permit dated _____ . Please proceed to issue the permit with no change.

____ The owner or certified company official finds condition number(s) _____ of the draft permit dated _____ unacceptable.

____ The suggested changes are attached for your consideration.

____ The owner or certified company official requests further discussion with DEQ regarding the above referenced condition(s).

Signature: _____

Name: _____

Title: _____

Facility: _____

Date: _____